

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HUNTAIR, INC.,)	Civil Action No. 07 C 6890
)	
Plaintiff,)	The Honorable David H. Coar
)	
v.)	Magistrate Judge Morton Denlow
)	
CLIMATECRAFT, INC.,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF STIPULATED REVISED SCHEDULING ORDER

Plaintiff and Counterclaim-Defendant, Huntair, Inc. (“Huntair”) and Defendant and Counterclaimant, ClimateCraft, Inc. (“ClimateCraft”), submit this Joint Motion for Entry of the attached Stipulated Revised Scheduling Order. While the revised schedule provides the parties additional needed time to complete fact discovery, it adheres to the Court’s Markman Schedule and Trial Schedule. It moves as few dates as possible.

As is shown by the attached proposed schedule (Exhibit A) (showing the current deadlines as strikeouts and the newly proposed deadlines in their place), fact discovery would be extended and expert discovery would be somewhat compressed, but only one deadline for filing with the Court would be changed: The deadline for submitting dispositive motions would be extended three weeks, from September 24 to October 14, 2008.

The motion and stipulated order also address two housekeeping matters: the deadline for modifying claim term contentions is shown as an exchange between the parties rather than a filing with the Court, as this is what counsel believes the Court intended (if this understanding is incorrect, counsel requests clarification). Second, during the scheduling conference, the Court discussed with counsel a July 18 deadline for responsive Markman briefs.

That deadline did not appear in the original order; the parties believe the omission to be inadvertent.

The parties have been vigorously working to complete discovery, but need more time to complete document production and to complete the taking of depositions. The Markman procedure is well underway and opening briefs will be filed on July 3. Briefing on claim construction will continue into mid-July and the parties need more time than the currently scheduled cutoff of July 31 to complete fact discovery.

The undersigned represents that Plaintiff's counsel, Richard T. McCaulley, Jr., has given him authority to file this Motion as a joint motion. The parties respectfully request that this Motion be granted.

Respectfully submitted,

Dated: June 16, 2008

/s/ Charles C. Kinne

Charles C. Kinne

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Attorney for ClimateCraft, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **JOINT MOTION FOR ENTRY OF STIPULATED REVISED SCHEDULING ORDER** was served by ECF upon:

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this 16th day of June, 2008.

/s/ Charles C. Kinne
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